

Defendants' Objections to Plaintiff's Trial Exhibits

No.	Exhibit	Objection
1.	Board of Alderman Meeting Minutes pgs. 1, 13-14, 17	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>
2.	Board of Aldermen Meeting Minutes pgs. 1, 6-8, 11	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>
3.	Responsive records Duhamel Emails received by Ortolano	Irrelevant <i>See defendants' objection ¶ 6</i>
4.	Ortolano RTK email to Leonard for "Donchess Timeline"	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
5.	LTR emailed City Response Leonard to Ortolano	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
6.	Ortolano RTK email to Leonard second try for "Donchess Timeline"	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
7.	Ortolano email to Gary Turgiss requesting Donchess Timeline Records	Irrelevant <i>See defendants' objection ¶ 4</i>
8.	LTR emailed City Response, Leonard for Donchess Timeline with Responsive Records	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶¶ 3, 4</i>
9.	Ortolano email to Board of Aldermen cc Donchess Mayor's Property Record Card	Irrelevant <i>See defendants' objection ¶ 4</i>
10.	Ortolano email to Board of Aldermen cc Donchess – A further look at Mayor's Property Record Card	Irrelevant <i>See defendants' objection ¶ 4</i>
11.	Board of Aldermen Meeting Minutes pgs. 1-3, 15-18, 23 and Communication from CFO Griffin Board of Aldermen	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>
12.	Board of Aldermen Meeting Minutes pgs. 1-3, 7-12, 16 Mayor responds to Rockland Permit	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>

13.	Union Leader Article "Citizen Complaint prompts assessing Audit in Nashua"	Irrelevant <i>See defendants' objection ¶¶ 5, 6</i>
14.	Board of Aldermen Meeting Minutes pgs. 1, 42-44, 47	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>
15.	Ortolano email to DRA Commission Stepp on Ratio	Irrelevant <i>See defendants' objection ¶ 6</i>
16.	Commissioner email response to Ortolano 3/21/19 email	Irrelevant <i>See defendants' objection ¶ 6</i>
17.	Board of Assessor Meeting Minutes - Bolton talks about the ratio	Irrelevant <i>See defendants' objection ¶ 6</i>
18.	Ortolano email to Greg Turgiss/Kleiner (Mayor's Office)	Irrelevant <i>See defendants' objection ¶ 6</i>
19.	Ortolano email to Attorney Roth DRA with 2 Abatement Form (State & Nashua)	Irrelevant, litigation privilege <i>See defendants' objection ¶ 7</i>
20.	City Charter - Section 71 Records open for Inspection	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
21.	Board of Assessors Meeting Minutes pgs. 1, 24 - 28, 39 - 43, 46	Irrelevant, hearsay <i>See defendants' objection ¶ 8</i>
22.	Kleiner email to Leonard fwd Ortolano email (7/12/2019)	Irrelevant <i>See defendants' objection ¶ 6</i>
23.	LTR Leonard email to Ortolano (RTK 2019-14)	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
24.	Leonard email to Kleiner, Legal "Conversations Assessing 8 22 19"	Irrelevant <i>See defendants' objection ¶ 6</i>
25.	Ortolano email to Assesshelp cc Kleiner	Irrelevant <i>See defendants' objection ¶ 6</i>
26.	LTR Leonard emailed to Ortolano (2019-15)	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>

27.	7/19/2019 LTR emailed Leonard response to Ortolano Assesshelp (2019-15)	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
28.	Board of Aldermen Meeting Minutes pgs. 1-10, 32 and with Attachment	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>
29.	RTK response from Leonard for Kleiner Assessing Office meeting Agendas	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
30.	Email Ortolano to Leonard cc Donchess, BOA Right to Know Requests	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
31.	Budget Review Committee Meeting - all pages	Irrelevant, hearsay <i>See defendants' objection ¶ 11</i>
32.	Board of Assessors Meeting Minutes pgs. 1, 5-10, 14	Irrelevant, hearsay <i>See defendants' objection ¶ 8</i>
33.	Board of Assessors Meeting Minutes - all pages	Irrelevant, hearsay <i>See defendants' objection ¶ 8</i>
34.	Email Kleiner to Leonard residential sales report threaded email Ortolano to Assessors (2019-122)	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
35.	Response Leonard to Ortolano (2019-122)	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
36.	BTLA Orders City to Hearing Aug 6, 2019	Irrelevant <i>See defendants' objection ¶ 6</i>
37.	Board of Alderman Meeting - LO PC on Arrest 1, 42, 47	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>
38.	Email Kleiner to Attorney Clay - Ortolano to HR	Irrelevant, hearsay <i>See defendants' objection ¶ 16</i>
39.	Email Nancy Trask - Ortolano visit to HR	Irrelevant, hearsay <i>See defendants' objection ¶ 16</i>

40.	Board of Aldermen Meeting Minutes pgs. 1, 13-15, 25-28, 31	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>
41.	Section 1 of Nashua Assessor Manual "Public Relations in the Assessor's Office	Irrelevant <i>See defendants' objection ¶ 6</i>
42.	BTLA Order for Reassessment	Irrelevant <i>See defendants' objection ¶ 6</i>
43.	Sanctions on Assessors - Jon Duhamel, Greg Turgiss, Rob Tozier	Irrelevant <i>See defendants' objection ¶ 6</i>
44.	Nashua Telegraph Article "Celebrate Sunshine Week"	Irrelevant <i>See defendants' objection ¶ 5</i>
45.	Ortolano email to Brown - Ortolano Abatement File	Irrelevant, litigation privilege <i>See defendants' objection ¶ 7</i>
46.	LTR Leonard email to Attorney Lehmann	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
47.	Ortolano email to Mayor	Irrelevant, litigation privilege <i>See defendants' objection ¶ 7</i>
48.	Board of Aldermen Zoom Meeting pgs 1, 31-33, 37	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>
49.	BTLA Submission - City Motion to Consolidate 2018-2019 Abatement Appeals	Irrelevant, litigation privilege <i>See defendants' objection ¶ 7</i>
50.	BTLA Submission - Lehmann Objection to Consolidation	Irrelevant, litigation privilege <i>See defendants' objection ¶ 7</i>
51.	BTLA Order - DENYING Consolidation	Irrelevant, litigation privilege <i>See defendants' objection ¶ 7</i>
52.	Scoop FB Post "Nashua's Overreach of the Right-to-Know Law"	Hearsay <i>See defendants' objection ¶ 9</i>
53.	BTLA Decision on 41 Berkeley St. 2018-2019 Abatement Appeals	Irrelevant, litigation privilege <i>See defendants' objection ¶ 7</i>
54.	Good-Gov "Nashua Legal Offices Abuse of Seniors"	Hearsay <i>See defendants' objection ¶ 9</i>

55.	Board of Assessors Meeting Minutes - all pages	Irrelevant, hearsay <i>See defendants' objection ¶ 8</i>
56.	Ortolano email to Assesshelp 2 Signed Abatement Applications	Irrelevant, litigation privilege <i>See defendants' objection ¶ 7</i>
57.	Ortolano email to Assesshelp	
58.	Rick Vincent email to Ortolano	
59.	Vincent email to Ortolano 28 Baltimore Rd Application	
60.	Vincent email to Ortolano 18 Baltimore Rd. Application	
61.	Vincent email to Ortolano 18 Baltimore Rd. Application	Irrelevant, litigation privilege, hearsay <i>See defendants' objection ¶¶ 7, 8</i>
62.	Complaint - Class A Misdemeanor	
63.	Arrest Warrant	
64.	Call log for Trespass at City Hall	
65.	Property taken at arrest 2/18/21	Irrelevant, hearsay <i>See defendants' objection ¶ 14</i>
66.	Bail and Bail Conditions	Irrelevant, hearsay <i>See defendants' objection ¶ 14</i>
67.	RTK Request from Colquhoun to NPD for Service calls for trespass to City Hall 1/1/2014 to 1/31/2021	<i>See defendants' pending motion in limine</i>
68.	LTR Mike O'Connor to BOA/cc Mayor on Woman Escorted Out by Police	Irrelevant, hearsay <i>See defendants' objection ¶ 16</i>
69.	Union Leader Story - "Woman Escorted out of City Hall by Police"	Irrelevant <i>See defendants' objection ¶ 5</i>
70.	Union Leader Story - "City Hall no-trespass order put in place against Nashua Woman"	Irrelevant <i>See defendants' objection ¶ 5</i>

71.	Union Leader Story - "Laurie Ortolano won't stop taking on City Hall"	Irrelevant <i>See defendants' objection ¶ 5</i>
72.	Union Leader Story "Nashua Woman escorted from City Hall charged with Trespassing"	Irrelevant <i>See defendants' objection ¶ 5</i>
73.	Ortolano email to Attorney Goulden Contract and Appearance	
74.	Kenney email to Bolton	Irrelevant, hearsay <i>See defendants' objection ¶ 14</i>
75.	Kenney email to Bolton	Irrelevant, hearsay <i>See defendants' objection ¶ 14</i>
76.	Email Kenney to Bolton	Irrelevant, hearsay <i>See defendants' objection ¶ 14</i>
77.	Transcript Motion Hearing Judge Leary	Irrelevant, hearsay <i>See defendants' objection ¶ 14</i>
78.	Conditional Discharge Order	Irrelevant, hearsay <i>See defendants' objection ¶ 14</i>
79.	City Motion to Intervene on Annulment	Irrelevant, hearsay <i>See defendants' objection ¶ 14</i>
80.	Order - Motion to Intervene DENIED	Irrelevant, hearsay <i>See defendants' objection ¶ 14</i>
81.	Notice for Access to Assessing Office during Covid	
82.	Ortolano Screenshots of City Hall Offices requiring Appointments	
83.	Notice for Reopening Nashua City Hall	
84.	Ortolano email to Leonard	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
85.	Attorney Bolton email to Attorney Lehmann	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>

86.	Fee Agreement Attorney Sisti/Check pd	Blank
87.	Fee Agreement Attorney Goulden/Check pd	Blank
88.	Lovering email to Ortolano cc Legal Dept. "Your Visit to the Clerk's Office on January 31, 2022"	Irrelevant and hearsay <i>See defendants' objection ¶ 16</i>
89.	Ortolano email to Lovering and Legal	Irrelevant and hearsay <i>See defendants' objection ¶ 16</i>
90.	City Finance Committee Meeting	Irrelevant, hearsay <i>See defendants' objection ¶ 12</i>
91.	Police Report 22-43246 Bolton Attempted Arrest for 3rd Floor Visit	<i>See defendants' pending motion in limine</i>
92.	Sgt. Gilbert Supplemental Report to Attempted Arrest	<i>See defendants' pending motion in limine</i>
93.	Ortolano email to Kleiner	<i>See defendants' pending motion in limine</i>
94.	Attorney Bolton email to Ortolano	<i>See defendants' pending motion in limine</i>
95.	Board of Aldermen Meeting Minutes pgs. 1, 13, 17	Irrelevant, hearsay <i>See defendants' objection ¶ 2</i>
96.	Newspaper Article on First Amendment Award	Irrelevant <i>See defendants' objection ¶ 5</i>
97.	First Amendment Publication Booklet	Irrelevant, hearsay <i>See defendants' objection ¶ 16</i>
98.	Eagle Sculpture Award - sculpture will be brought into Court	Irrelevant, hearsay <i>See defendants' objection ¶ 16</i>
99.	City Protective Order for City Employees	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
100.	Court Order DENIED for Protective Order	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>

101.	Property Record Card for 41 Berkeley St.	Irrelevant, litigation privilege <i>See defendants' objection ¶ 7</i>
102.	Ortolano Email to Bolton RTK for IT meeting	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
103.	Ortolano Email to Bolton RTK for IT meeting	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
104.	Bolton Email to LO on RTK Meeting	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
105.	Photograph 3rd Floor Legal Office Rope	
106.	Photograph 3rd Floor Hallway to Auditorium	
107.	Photograph 3rd Floor view to IT Office	
108.	Photograph 3rd floor view to stairwell	
109.	Superior Court Order 226-2021-cv-00354	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
110.	Supreme Court Mandate 2022-0237	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
111.	Superior Court Order 226-2021-cv-00306	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
112.	Transcript Structuring Conference/Motion Hearing 00306/00133	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
113.	Superior Court Order 226-2020-cv-00133	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
114.	Superior Court Order 226-2020-cv-00133	Litigation privilege, hearsay, irrelevant

		<i>See defendants' objection ¶ 3</i>
115.	Superior Court Order 226-2023-cv-00165	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
116.	Ortolano Deposition by Bolton 226-2020-cv-00133	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
117.	Ortolano RTK Request for Bolton Police records - 10-4-2012 Incident 12- 83358	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
118.	BTLA Hearing A Citizens Performance Audit of the Nashua Assessing Office	Irrelevant <i>See defendants' objection ¶ 6</i>
No. Potential Exhibits		
119.	Letter from Gary Turgiss to Ortolano's	Irrelevant <i>See defendants' objection ¶ 6</i>
120.	11/20/2019 Griffin email to Leonard threaded 9/19/2018 Tozier email to Griffin	Irrelevant <i>See defendants' objection ¶ 6</i>
121.	Letters mailed by City to 5 Berkeley property owners	Irrelevant <i>See defendants' objection ¶ 6</i>
122.	Griffin Email to Mayor's Office	Irrelevant <i>See defendants' objection ¶ 6</i>
123.	Supreme Court Order on Nashua Pheasant Lane Mall Property Abatement Appeal	Irrelevant, hearsay <i>See defendants' objection ¶ 16</i>
124.	Management Audit Report	Irrelevant <i>See defendants' objection ¶ 6</i>
125.	Nashua Telegraph "Officials Say they are overwhelmed by requests"	Irrelevant <i>See defendants' objection ¶ 5</i>
126.	Cummings email to Risk and Legal	Irrelevant, hearsay <i>See defendants' objection ¶ 16</i>
127.	Ortolano email RTK request to Public Works Director Fauteaux and her response	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶¶ 3,</i>

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128.	Email Manuela Perry email to Ortolano	Irrelevant, hearsay <i>See defendants' objection ¶ 16</i>
129.	Freyler Investigative Report	Irrelevant <i>See defendants' objection ¶ 6</i>
127. (sic)	Transcript Evidentiary Hearing 226-2020-cv-00354	Litigation privilege, hearsay, irrelevant <i>See defendants' objection ¶ 3</i>
No. Video/Audio Files		
128. (sic)	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>
129. (sic)	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>
130.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>
131.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>
132.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 8, 13</i>
133.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 8, 13</i>
134.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>

135.	Budget Review Committee Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 11, 13</i>
136.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 8, 13</i>
137.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 8, 13</i>
138.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 8, 13</i>
139.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>
140.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>
141.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 8, 13</i>
142.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>
143.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 8, 13</i>

144.	Finance Committee Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 12, 13</i>
145.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>
146.	School Board Recount	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 13, 16</i>
147.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 2, 13</i>
148.	Introduction on Filing an Abatement	Irrelevant, litigation privilege, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 7, 13</i>
149.	Reading Your Property Record Card	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 6, 13</i>
150.	The Ratio	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶¶ 6, 13</i>
151.	3 rd Floor Video of Hallway and Legal Office	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶ 13</i>
152.	City Hall Surveillance Video obtained by Police or Ortolano in City Hall in 1/17/2021	Irrelevant, hearsay, cumulative, undue prejudice <i>See defendants' objection ¶ 13</i>
153.	Police Dispatch Call	Irrelevant, hearsay, cumulative, undue prejudice

		<i>See defendants' objection ¶ 13</i>
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